

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Phillip G. Gates,	)	Case No. 19-23821 JAD
Debtor(s)	)	Chapter 13
	)	Related to Docket No. 87-88
	)	
	)	
Ronda J. Winnecour, Chapter 13	)	
Trustee,	)	Hearing Date and Time:
Movant(s)	)	November 6, 2024 at 10:00 a.m.
	)	
	)	
vs.	)	
	)	
Phillip G. Gates,	)	
Respondent(s)	)	

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

AND NOW, comes the Debtor, Phillip G. Gates, by and through his attorney Christopher M. Frye, and Steidl and Steinberg, and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor avers that currently \$761.59 is needed to complete the plan.
5. Admitted. The Debtors will remit the funds necessary to complete the plan through the existing wage attachment order by November 2024 and will resume the long term debt payments on December 1, 2024.

WHEREFORE, the Debtor, Phillip G. Gates, respectfully requests this Honorable Court to deny the Trustee's Motion to Dismiss.

Respectfully submitted,

October 17, 2024  
DATE

/s/ Christopher M. Frye  
Christopher M. Frye, Esquire  
Attorney for the Debtor

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